

# Exhibit 1

STATE OF MICHIGAN

IN THE 3RD JUDICIAL CIRCUIT COURT FOR THE COUNTY OF WAYNE

Antonio Lavon MANNING,

*Plaintiff,*

Case Number: 24-\_\_\_\_\_-CZ

The Honorable \_\_\_\_\_

v

DELTA AIR LINES Inc.; John Doe Lead  
Flight Attendant; ; John and Jane Doe  
# 1-5

*Defendant.*

COMPLAINT

*There is no other pending or resolved civil action arising out of the same transaction or occurrence alleged in this complaint.*

*Introduction*

1. This is an action for personal injury arising out of an incident that occurred on August 5, 2024, while the Plaintiff was deboarding a Delta Airlines flight at Detroit Metropolitan Wayne County Airport (DTW) in Detroit, Michigan.

*Parties*

2. Plaintiff, Antonio Lavon Manning (hereinafter "Manning"), is a resident of [Detroit, Michigan] and was a passenger on Delta Airlines Flight No. DL 732 on August 5, 2024.
3. Defendant, Delta Air Lines, Inc., is a corporation organized under the laws of the State of Delaware with its principal place of business at 1030 Delta Blvd, Atlanta, GA 30354-1989, and is authorized to do business in the State of Michigan.



*Jurisdiction and Venue*

4. This Court has jurisdiction over this action pursuant to **MCL 600.705** and **MCL 600.711**, as the incident occurred within the State of Michigan, and Defendant Delta Air Lines, Inc. conducts business in Michigan.
5. Venue is proper in this Court pursuant to **MCL 600.1621** and **MCL 600.1641**, as the cause of action arose in Wayne County, Michigan, where Delta Air Lines, Inc. conducts business, and the incident occurred at Detroit Metropolitan Wayne County Airport.

*Facts*

6. On August 5, 2024, Plaintiff was a passenger on Delta Airlines Flight No. DL 732, which landed at Detroit Metropolitan Wayne County Airport from Las Vegas, Nevada.
7. As Plaintiff was deboarding the aircraft, another passenger struck Plaintiff in the head with a heavy bag, causing Plaintiff to become disoriented and subsequently vomited. He required assistance disembarking from the plane by a Delta Supervisor.
8. The incident was witnessed by several passengers and flight crew members aboard the aircraft.
9. A police report was filed with the Wayne County Airport Police Authority, and Plaintiff was transported by EMS to Corewell Health / Beaumont Hospital (Wayne Campus). The Plaintiff later went to the Corewell Health (Dearborn Campus) to receive final diagnosis of a head injury. He was also seen by the University of Michigan Hospital- Ann Arbor Campus and diagnosed with a Concussion.
10. Plaintiff was diagnosed with a concussion and suffered from symptoms including headaches, nausea, dizziness, and ongoing cognitive difficulties.



11. As a direct result of the incident, Plaintiff has incurred medical expenses, experienced pain and suffering, and suffered emotional distress and other damages.

*Causes of Action*

**COUNT I- NEGLIGENCE**

12. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
13. Defendant Delta Air Lines, Inc. owed a duty of care to Plaintiff, including but not limited to, ensuring the safety of its passengers while onboard and during deboarding.
14. Defendant breached its duty of care by failing to adequately supervise and control the deboarding process, failing to ensure that passengers did not pose a risk to each other, and failing to take appropriate measures to prevent injuries.
15. As a direct and proximate result of Defendant's negligence, Plaintiff sustained serious injuries and damages.

**Count II – Premises Liability**

16. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
17. Defendant, as the operator of the aircraft, owed a duty to exercise reasonable care to protect Plaintiff from foreseeable harm while on its premises.
18. Defendant breached this duty by allowing unsafe conditions to exist during the deboarding process.
19. As a result of Defendant's breach, Plaintiff suffered injuries, incurred medical expenses, and experienced pain, suffering, and emotional distress.



### **DAMAGES**

20. As a result of Defendant's actions, Plaintiff seeks compensatory damages, including but not limited to:

- Medical expenses (past, present, and future)
- Lost wages and loss of earning capacity
- Pain and suffering
- Emotional distress
- Other incidental damages

### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff requests judgment against Defendant as follows:

- A. Compensatory damages in an amount to be determined at trial;
- B. Costs and expenses incurred in bringing this action, including reasonable attorney's fees;
- C. Any other relief the Court deems just and proper.

### **DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,



Antonio Lavon Manning  
Appearing in *Propria Persona*  
Mailing Address: 26200 Ford Road, # 753  
Dearborn Heights, Michigan 48127  
[consultingsmarter@gmail.com](mailto:consultingsmarter@gmail.com)